

Privacy Policy

Last updated: _____

Effective date: _____

Our website <https://www.advision.digital> (the “**Website**”) and all subdomains of <https://www.advision.digital> are owned and administered by **ADVISION LLC**, a limited liability company incorporated and existing under the laws of Ukraine (51925, Dnipropetrovsk Region, Kamianske, 10 Prokhidnyi Tupyk) (the “**Company**”, “**We**”, “**Us**”, “**Our**”).

You may contact Us with any questions at: hello@advision.digital.

We specialize in providing AdTech and MarTech software solutions, including CMS solutions for Digital Signage, audio systems, DOOH SSP, and Wi-Fi tracking for advertising monetization.

This Privacy Policy (the “**Policy**”) applies solely to the use of this Website. The Policy does not apply to any other websites that may be linked to from this Website, regardless of whether such links were placed by Us or by other users.

We do not control how your data is collected, stored, or used by third-party websites, and We encourage you to review the privacy policies of such websites before providing them with any personal data.

This Policy applies to:

- visitors of the Website;
- Our clients who are users of the Platform within the meaning of the Platform Terms of Service (including their internal users and employees) (collectively, the “**Users**”, “**You**”).

The Company recognizes Your right to personal data protection and undertakes to protect it. This Policy explains what data We collect, how We use it, and how You may correct or modify such data. You may obtain the following information regarding Your personal data:

- what data is collected;
- who collects the data;
- how the data is used;
- to whom the data may be transferred;
- what choices You have regarding the collection, use, and transfer of the data;
- what procedures are applied to protect the data under Our control from loss, misuse, or alteration;
- how You may correct inaccuracies in the data.

If You have any additional questions, please contact Our data protection team at: hello@advision.digital.

1. SCOPE AND CONTENT OF PERSONAL DATA

We comply with all requirements and conditions established by the applicable laws of Ukraine and European legislation, including, without limitation, the General Data Protection Regulation (GDPR), as well as other international legal acts concerning personal data protection.

We collect personal data based on consent obtained from Users who have reached the age of 18 (eighteen). If You become aware that the Company processes data relating to individuals under the age of 18 (eighteen), please notify Us by email at: hello@advision.digital.

“*Personal data*” means any information directly or indirectly related to an identified or identifiable User. Such information may include: first name, surname, patronymic (if applicable), phone number, email

address, date of birth, legal and commercial name of a legal entity, information regarding children presence, gender, hobbies, ownership of pets, ownership of a vehicle and its VIN number, communication language, residential/place of stay/delivery address, information regarding the User's actions while using the Website and/or the Platform, IP address, information about devices used by the User (device type, browser type, operating system), message history (including correspondence between the User and the Company, reviews, comments, and other communication data), information voluntarily provided by the User in the registration form and/or profile on the Website and/or Platform, information provided during surveys (through questionnaires or otherwise), information obtained during oral communication between the User and the Company, and information provided during payments on the Website and/or Platform (including when purchasing goods and/or services offered to Users), including passport information, tax identification number, and other information.

This list of personal data is not exhaustive or mandatory for all Users and depends on the User's needs, preferences, and actions performed on the Website and/or Platform.

Personal data also includes other information lawfully obtained by the Company from third parties and/or available from the User's social media profiles in cases where registration on the Website and/or Platform is carried out through social media authentication services. In such cases, the User consents to the processing of information available in the relevant social media accounts (profiles).

We do not collect and/or process personal data concerning racial or ethnic origin, political, religious, or philosophical beliefs, membership in political parties or trade unions, criminal convictions, or data concerning health, sex life, biometric, or genetic data.

2. LEGAL GROUNDS AND PURPOSES OF PERSONAL DATA PROCESSING

We guarantee that Your personal data is processed lawfully, fairly, and transparently without adversely affecting Your fundamental rights and freedoms. The legal grounds for processing personal data are:

- Your consent to the processing of personal data;
- authorization granted to Us under applicable law solely for the exercise of Our powers;
- conclusion and performance of a transaction with You, or a transaction concluded in Your favor, or taking steps at Your request prior to entering into a transaction;
- protection of Your vital interests as a data subject;
- compliance with legal obligations imposed on Us under applicable law;
- the necessity to protect Our legitimate interests or those of a third party to whom personal data is transferred, except where such interests are overridden by Your fundamental rights and freedoms.

The purposes of processing Users' personal data include:

1. ensuring the implementation of civil, commercial, and tax relations, as well as the exercise of the Company's functions, powers, and obligations in accordance with the laws of Ukraine;
2. identification of the client as a User of the Website and/or Platform, communication with the User, including for the provision of services, payment processing, settlements, reporting, accounting and management records, creation and implementation of bonus and loyalty programs, sending postal and electronic mailings and phone communications, including commercial offers, notifications regarding promotions and Company news, provision of financial services by third parties and/or Company partners, improving the quality of goods/services, ranking offers on the Website and/or Platform, analyzing User activity, keyword searches, traffic management on the Website and/or Platform, analysis and forecasting of Users' preferences and interests to create the most relevant and beneficial personalized or promotional offers, scientific and analytical activities, informational and marketing mailings (news, promotions, promo codes, discounts, personalized recommendations, personalized offers, etc.);

3. sending mailings, commercial offers, notifications regarding promotions, loyalty and bonus programs, and/or notifications regarding the operation of the Website and/or Platform by post, email, phone number, informational notifications, and alerts.

The User may unsubscribe from informational and marketing communications at any time by sending an email to hello@advision.digital with the subject line "Refusal to receive informational and marketing communications":

4. fulfillment of other obligations imposed on the Company by law as the controller of personal data, and protection of the Company's legitimate interests or the interests of third parties to whom personal data is transferred.

Processing of personal data is limited to collecting the minimum amount of mandatory information necessary solely to fulfill the User's request. In all cases where optional information is requested, the User will be informed thereof at the time of collection. Optional information is provided voluntarily and at the User's discretion. The Company uses such information to improve the Website, Platform, and Services and to provide Users with offers based on their preferences and voluntarily provided information.

3. YOUR RIGHTS UNDER GDPR

Our Policy provides You with the ability to exercise the following rights under GDPR as a data subject:

- the right to be informed about the personal data being processed;
- the right to request access to, erasure ("right to be forgotten"), or rectification of Your personal data;
- the right to restriction of processing;
- the right to data portability;
- the right to object to processing;
- the right to lodge a complaint with a supervisory authority;
- the right not to be subject to automated decision-making and profiling.

To exercise any of the above rights, please contact Our data protection team at: hello@advision.digital.

If any of Your personal data is used by Us for automated decision-making and such decisions have legal or similarly significant effects on You, You have the right under GDPR to contest such decisions and request human intervention.

The above right does not apply where:

- the decision is necessary for entering into or performing a contract between You and Us;
- the decision is authorized by law; or
- You have given explicit consent to such automated decision-making.

At present, We do not use ANY automated decision-making for any purpose.

We profile personal data for marketing and advertising purposes. Where profiling is carried out:

- clear information explaining the profiling, its significance, and likely consequences will be provided;
- appropriate mathematical or statistical procedures will be used;
- appropriate technical and organizational measures will be implemented to minimize errors and allow such errors to be corrected easily; and
- all personal data processed for profiling purposes will be protected against discriminatory effects resulting from profiling.

4. TERMS OF PROCESSING AND STORAGE OF PERSONAL DATA

The terms of processing and storage of personal data are determined based on the purposes of processing and the terms specified in agreements concluded with Users in accordance with Ukrainian law. Personal data shall be processed and stored for as long as necessary to fulfill the purposes for which it was collected, including compliance with legal, accounting, or reporting obligations, or until deletion is requested by the User.

Users may at any time modify/delete personal information, unsubscribe from communications, or withdraw consent to data processing through their personal account or by sending an email to hello@advision.digital with the subject line “*Personal Data*”.

If there is no activity in the User's account for more than 12 (twelve) months, the Company reserves the right to delete the User's account, including all personal data stored therein, which means the User will no longer be able to access or use such account.

5. DATA STORAGE AND SECURITY

We primarily store User data in Ukraine and the European Economic Area (“EEA”). To facilitate Our global operations, We may transfer and access such data worldwide, including in countries where We operate. Some or all of Your data may be stored or transferred outside the EEA. If You do not agree to this, please contact Our data protection team with a relevant request.

Where data is stored or transferred outside the EEA, We will take all reasonable steps to ensure that Your data is treated securely and in accordance with GDPR standards. Such measures may include contractual obligations between Us and third parties engaged by Us.

Data security is very important to Us, and to protect Your data collected through the Website, We have implemented appropriate physical, electronic, and administrative safeguards.

We take the following measures to ensure data security and protection:

- access to data stored on the Website is limited to a defined number of employees;
- We use industry best practices to ensure the security of any data collected and/or transmitted through the Website. The Website is protected by SSL encryption;
- We use the TLS cryptographic protocol, commonly known as HTTPS, for all transmitted and received data;
- the Website is protected by: (a) firewalls separating Our trusted internal network from the Internet; and (b) IP-based access restrictions;
- We use third-party providers to prevent attacks against the Website, destruction, or theft of data;
- We periodically review Our data collection and processing methods and amend this Policy accordingly.

Despite the security measures We take, transmission of data over the Internet cannot be guaranteed to be completely secure, and We encourage You to take appropriate precautions when transmitting data online.

For the purposes of protecting Users' Accounts and personal data from unauthorized access, two-factor authentication may additionally be used as an extra layer of account protection.

Two-factor authentication is activated where the User's Account:

- contains a verified phone number;
- is linked to a bank card.

When the User logs in from an unknown device, in addition to entering a password, the User will also be required to enter a one-time 6-digit code sent via SMS or Viber message, or pass additional verification of

trusted devices (verified device/application identifier). The message will also contain login information, including:

- date of authorization attempt;
- device IP address;
- client browser type.

6. DISCLOSURE OF DATA

We may engage third parties (including search engines, advertising, and marketing providers) to provide services presented on the Website on Our behalf. In some cases, such third parties may require access to some or all of Your data. In such cases, We will provide access only with Your consent and will take all reasonable measures to ensure secure and lawful processing of Your data.

We may collect anonymized statistical data regarding use of the Website, including traffic, User behavior, sales, and similar information. Such data will not identify any individual. We may share such anonymized data with third parties including potential investors, affiliates, partners, and advertisers, strictly in accordance with applicable law.

Under certain circumstances, We may be legally obligated to disclose certain data, including Your personal data, for example in connection with legal proceedings, statutory obligations, court orders, or requests of competent governmental authorities. In such cases, We will not require additional consent from You.

7. TRANSFER OF CONTROL

We may, from time to time, expand or reduce the range of services presented on the Website, which may involve the sale and/or transfer of control of all or part of the Company. If Users' data relates to any transferred part of the business, such data will be transferred together with that part. The new owner or controlling party will be permitted to use such data for the purposes for which it was originally collected under this Policy. In such cases, We will not separately notify You of such changes.

8. COOKIES

We use cookies to continuously improve the user experience on the Website. Cookies are small data files placed in Your browser or device. They are read during subsequent visits in order to personalize Your experience, including the advertising displayed to You.

We collect and process various types of non-personally identifiable data to prevent fraud and provide better access to the Website for all Users.

To learn more about how We process cookies and use such data, please refer to Our Cookie Policy.

9. WITHDRAWAL OF CONSENT

We provide You with the opportunity at any time to withdraw Your consent to the use of Your personal data, update, modify, or delete Your personal data from the Website, and unsubscribe from communications from Us.

Please contact Our data protection team with the relevant request at hello@advision.digital or by mail at: 51925, Dnipropetrovsk Region, Kamianske, 10 Prokhydniy Tupyk.

10. AMENDMENTS

We may amend this Policy from time to time if deemed necessary or required by applicable law. Any changes will be promptly published on the Website, and You will be deemed to have accepted the terms of the updated Policy upon Your first use of the Website after such publication.

We recommend that You regularly review this page for the latest information.

Contact us

If you have any additional questions regarding this Policy or any related matters, you may contact us by email at: hello@advision.digital.